

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: MELISSA BIGELOW,**

**Debtor**

**ROCKET MORTGAGE, LLC f/k/a QUICKEN  
LOANS, LLC f/k/a QUICKEN LOANS, INC.,**

**Movant**

**vs.**

**MELISSA BIGELOW, Debtor  
And JACK N. ZAHAROPOULOS, Trustee,**

**Respondents**

**CHAPTER 13 BANKRUPTCY**

**CASE NO. 5-19-01054 MJC**

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**ANSWER TO MOTION OF ROCKET MORTGAGE, LLC  
f/k/a Quicken Loans, LLC f/k/a Quicken Loans, Inc.  
FOR RELIEF FROM THE AUTOMATIC STAY  
15 W. Noble Street, Nanticoke, PA 18634**

NOW, the Debtor, by and through her counsel, Kevin M. Walsh, Esquire, answers said

Motion for Relief from Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied in that a recorded Mortgage should speak for itself.
5. Admitted only that the automatic stay is in effect.
6. Denied. It is denied there is any balance due Movant.
7. Denied. It is denied there is any balance due Movant.

8. Denied. Movant is not entitled to relief from the provisions of the automatic stay.

There is no balance due Movant. Movant is or has been is adequately protected.

9. Denied as but a legal conclusion without necessity of a response.

WHEREFORE, Debtor respectfully requests that the Motion for Relief be denied and dismissed together with such other and further relief as this Court deems just and appropriate.

/s/Kevin M. Walsh

Kevin M. Walsh, Esquire

Attorney I.D. No. 35209

Attorney for Debtor

297-299 Pierce Street

Kingston, PA 18704

(570) 283-3041

kmwesq@aol.com

## **CERTIFICATE OF SERVICE**

I, Kevin M. Walsh, Esquire, certify that a true and correct copy of the foregoing Answer To Motion was forwarded to the below named on the 30<sup>th</sup> day of January, 2024, as follows:

**Jack Zaharopoulos, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036**

- **By Clerk's Notice of Electronic Filing**

**Denise Carlon, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532**

- **By Clerk's Notice of Electronic Filing**

**Debtor**

- **By e-mail**

/s/Kevin M. Walsh

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